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MEMO ENDORSED

March 31, 2020

Hon. Colleen McMahon  
Daniel P. Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

US v. Ramon Solla, 19 Cr. 740 (CM)

Dear Chief Judge McMahon:

Elizabeth Macedonio and I are for Ramon Solla. In light of the COVID-19 pandemic and its evolving impact, we respectfully request that the next status conference, currently scheduled for April 7, 2020, be adjourned for approximately 45 days.

As of March 13, 2020, attorney visitation at the MCC was suspended for thirty days to prevent or reduce the spread of COVID-19. Even before that, attorney visitation at the MCC was severely curtailed due to a lockdown and search of the facility. Consequently, Ms. Macedonio and I have been unable to complete discovery review and consultation with Mr. Solla.

We respectfully request that the time until any adjournment date be excluded for speedy trial purposes, pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(i) and (iv). The adjournment is necessary to guarantee effectiveness of counsel and prevent any possible miscarriage of justice. The value of this exclusion outweighs the best interests of the defendants and the public to a speedy trial.

Assistant United States Attorneys Allison Nichols and Maurene Comey inform me that they have no objection to this application.

Sincerely,

/s/

Donald J. Yannella, Esq.

4/2/20

Case adj to June 2, 2020  
At 2 PM - time excluded  
through June 2, in the interest  
of justice.

Colleen McMahon

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